

FILED
MAR 02 2011
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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CR 11-40018

Plaintiff,

INDICTMENT

vs.

Attempted Commercial Sex
Trafficking

DARON LEE JUNGERS,
a/k/a "sexymd2spoilu@yahoo.com",
a/k/a "Josh Broden."

18 U.S.C. §§ 1591 and 1594(a)

Defendant.

The Grand Jury charges:

On or about February 12, 2011, in the District of South Dakota and elsewhere, Daron Lee Jungers, a/k/a "sexymd2spoilu@yahoo.com", a/k/a "Josh Broden", defendant herein, knowingly, in and affecting interstate commerce, attempted to recruit, entice and obtain a person who had not attained the age of 18 years, and knew that the person would be caused to engage in a commercial sex act; all in violation of 18 U.S.C. §§1591 and 1594(a).

FORFEITURE ALLEGATION

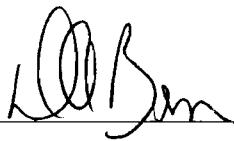
1. The allegations contained in this indictment are re-alleged as if fully set forth here, for the purpose of alleging forfeiture, pursuant to 18 U.S.C. § 1594(d)(1).

2. If convicted of an offense set forth above, Daron Lee jungers, a/k/a "sexymd2spoilu@yahoo.com", a/k/a "Josh Broden", the defendant herein, shall

forfeit to the United States any and all materials or property used or intended to be used to commit or to facilitate commercial sex trafficking. Such property includes, but is not limited to:

- a. Samsung Verizon cellular telephone, model sch-u350, serial number A000001DDDB89C.
- b. Dell Dimension 4400 Computer, serial number 791WC11.

A TRUE BILL:



Foreperson

BRENDAN V. JOHNSON
United States Attorney

By:

